

EXHIBIT 5

**DECLARATION OF DANIEL STRATTON
PURSUANT TO 28 U.S.C. § 1746**

I, Daniel Stratton, hereby make the following declaration based upon my personal knowledge:

1. I am making this declaration voluntarily, and I authorize its use by the Commodity Futures Trading Commission or its representatives in any proceeding relating to the matters described herein.
2. I am over 21 years of age and I reside in Houston, Texas.

Background

3. In approximately July 2017, I became aware of a company called Control-Finance Limited (“Control-Finance”) by viewing YouTube videos and Facebook discussions about the company. In the YouTube videos and Facebook discussions I saw, persons who claimed to have invested Bitcoin with Control-Finance represented that they had received Bitcoin trading profits on their investments.
4. The YouTube and Facebook content that I reviewed described Control-Finance as a Bitcoin investment platform that traded Bitcoin on customers’ behalf and distributed guaranteed trading profits to investors in the form of Bitcoin payments. It was my understanding that Control-Finance investors received larger Bitcoin payments as they deposited more Bitcoin with Control-Finance.
5. Based on the content I viewed on YouTube and Facebook, I became interested in investing Bitcoin with Control-Finance.
6. In approximately July 2017, I visited Control-Finance’s website, which was available at www.control-finance.com (the “Control-Finance Website”). The Control-Finance Website represented that all Bitcoin deposits provided to Control-Finance would generate 2.5% daily returns for the investor.

7. The Control-Finance Website also represented that I could be an affiliate and would earn Bitcoin for holding meetings locally and signing people up.

Account Opening

8. On August 9, 2017, I opened a Control-Finance account by creating a login and password through the Control-Finance Website.
9. Also on August 9, 2017, shortly after opening my Control-Finance account, I received an email from admin@control-finance.com, which is the email address that Control-Finance used to communicate with me after I opened my account. The August 9, 2017, email that I received from Control-Finance confirmed that my Control-Finance account had been opened and explained that I could log into my account through the Control-Finance Website. A true and correct copy of this email is attached as Exhibit A.
10. The August 9, 2017, email I received from Control-Finance also stated, “we’ll do everything we can to make your work easier and your profit level higher,” and “Your financial success is important to us, since the success of our company depends on it. Now you have the unique ability to make a profit on transactions in the lucrative cryptocurrency market and earn passive income from our affiliate program.” See Exhibit A.

The Affiliate Program and the Brandbook

11. The “affiliate program” identified in Exhibit A was a marketing system through which Control-Finance promised to pay Bitcoin rewards to anyone who convinced other people to deposit Bitcoin with Control-Finance. Control-Finance advertised the affiliate program through the Control-Finance Website. Under the affiliate program, affiliates

were offered escalating bonuses that increased in value as the affiliate introduced additional persons to Control-Finance.

12. The Control-Finance Website detailed the rewards and bonuses that affiliates could earn if they referred other persons to Control-Finance. These rewards and bonuses were paid to Control-Finance affiliates in the form of Bitcoin deposits.

13. Depositing Bitcoin with Control-Finance was not a requirement to be an affiliate. Instead, a person could become an affiliate by signing up as an affiliate on the Control-Finance Website, which would then create a hyperlink specific to the new affiliate. The affiliate could then share the hyperlink with other people. The Control-Finance Website advertised that if anyone clicked on the hyperlink and deposited Bitcoin with Control-Finance, the referring affiliate would receive a percentage of the new investor's Bitcoin deposit.

14. The Control-Finance Website provided a downloadable "brandbook," entitled "Brand Identity Guidelines," which contained detailed instructions for designing branded Control-Finance merchandise and logos. The brandbook provided Control-Finance affiliates with technical specifications for creating Control-Finance business cards, letterhead, and branded merchandise for use in marketing Control-Finance to other persons. A true and correct copy of the Control-Finance brandbook is attached as Exhibit B.

15. Page 8 of the Control-Finance brandbook (Exhibit B) provides a picture of a sample Control-Finance business card. The text on the picture of the sample business card reads as follows:

BENJAMIN REYNOLDS
Control-Finance Limited
M2 3AW United Kingdom
Manchester17 Marble Street

tel: +44.1618843043
admin@control-finance.com
www.control-finance.com

16. Page 14 of the Control-Finance brandbook (Exhibit B) provides a picture of a sample

Control-Finance badge. The text on the picture of the sample badge reads as follows:

BENJAMIN REYNOLDS
CONTROL-FINANCE LIMITED
Director

Tel: +44.1618843043
admin@control-finance.com
www.control-finance.com

Weekly Trade Reports

17. The Control-Finance Website posted weekly trade reports that Control-Finance represented as detailing the cryptocurrency trades that Control-Finance placed on behalf of its customers during the week covered by the trade report.
18. Between August and September 2017, I received emails from Control-Finance's admin@control-finance.com email address that directed me to view weekly trade reports that had been posted to the Control-Finance Website.
19. Attached as Exhibit C is a true and correct copy of an email I received from Control-Finance's admin@control-finance.com email address on August 19, 2017, notifying me that the weekly trade report for August 7 – August 13, 2017, had been posted to the Control-Finance Website.

Bitcoin Transactions with Control-Finance

20. On or around August 10, 2017, I deposited approximately 2.9 Bitcoin into my Control-Finance account for the purpose of investing with Control-Finance. At the time of the deposit, 2.9 Bitcoin was worth approximately \$10,000.
21. To invest my 2.9 Bitcoin with Control-Finance, I first logged into my Control-Finance account through the Control-Finance Website. Once I was logged in to my account, the Control-Finance Website directed me to deposit Bitcoin into wallet address 1CQbSNzjSoZ3yQiBxfkWZvZueaNghGh6F4.
22. Based on the instructions I received through the Control-Finance Website, I used the Control-Finance Website to deposit approximately 2.9 Bitcoin to wallet address 1CQbSNzjSoZ3yQiBxfkWZvZueaNghGh6F4. I made this deposit for the purpose of investing in Control-Finance, with the belief that Control-Finance would trade the Bitcoin on my behalf.
23. At various times in August and September 2017, Control-Finance transferred Bitcoin to my wallet address. These transfers were reflected in my Control-Finance account.
24. Based on the representations on the Control Finance Website, I believed that the transfers of Bitcoin that I received from Control-Finance reflected trading profits on the approximately 2.9 Bitcoin that I invested with Control-Finance.
25. At various times in August and September 2017, Control-Finance sent me email confirmations of incoming Bitcoin transfers that Control-Finance sent to my wallet address. Control-Finance used the admin@control-finance.com email address to send me email confirmations of incoming Bitcoin deposits.

26. Attached as Exhibit D is a true and correct copy of an email confirmation I received from Control-Finance on August 29, 2017. The email confirmation reads:

Hello Daniel Stratton.

\$202.67 has been successfully sent to your Bitcoin account
16RtpNRv2aEukSoimjW2Uw2RWXBE4d2S67. Transaction batch is
CWBH2DYX5QDVQLOU3INNZPJHTR.

control-finance.com
https://control-finance.com

27. In total, Control-Finance transferred approximately .54 Bitcoin to my wallet address between August and September 2017.
28. .54 Bitcoin represents 18.62% of my approximately 2.9 Bitcoin investment with Control-Finance. I never received the return of my remaining 2.36 Bitcoin investment, and Control-Finance paid me no other profits or investment returns in any form.

Control-Finance Shuts Down

29. On or around September 10 or 11, 2017, the Control-Finance Website disappeared from the internet, and I was no longer able to log into or view my Control-Finance account.

A. The Email of September 11, 2017

30. On September 11, 2017, Control-Finance sent an email to me from the admin@control-finance.com email address. The September 11 email provided in part, "As you all know we currently experience an issue with delayed payments, but we're now establishing a new algorithm for automatic processing of all payments which will release your delayed payments in a short time." A true and correct copy of this email message is attached as Exhibit E.

31. The September 11, 2017, email further provided, “We have a big amount of withdrawal requests, so we can’t process them all manually, but the new system will be up and running since [sic] on September 11, 12:00 PM (UK Time).” *See* Exhibit E.
32. In addition, the September 11, 2017, email stated, “In accordance with our new guidelines for traders, we have diversified the funds on trading accounts [sic], which led to a blocking of a few of them. The exchange reps informed us that the accounts were temporarily blocked as a measure against money laundering. Our lawyers are working to activate the accounts and according to the information from the exchange, our accounts will be unblocked not later than September 17.” *See* Exhibit E.
33. The September 11, 2017, email guaranteed to repay Control-Finance investors for their Bitcoin deposits. The email concluded, “These challenges putting us on test [sic], but we feel your support and we guarantee that we’ll fulfill all obligations given to our customers. . . . We will live through the challenges and continue our stable growth to high profits as we always did in our company.” *See* Exhibit E.
34. Despite the statements made in Control-Finance’s September 11, 2017, email (Exhibit E), I never received any Bitcoin or monetary transfers from Control-Finance after September 11, 2017.

B. The Email of September 12, 2017

35. On September 12, 2017, Control-Finance sent an email to me from the admin@control-finance.com email address. The September 12 email stated:

We would like to inform you of the urgent news. Our lawyers received information about the conditions for unlocking all trading accounts of the company. One of them is getting the necessary package of documents and license. This will allow us to restore access to our accounts and conduct our trading activities on the crypto-currency markets completely legally.

A true and correct copy of the September 12, 2017, email is attached as Exhibit F.

36. The September 12, 2017, email (Exhibit F) further provided:

Blocking of accounts at the moment and suspension of payments is considered to be a force majeure situation. In this connection, we are forced to fulfill our obligations to clients.

This will be organized in the form of, payment of the customer's deposit (taking into account already previously paid applications for payment of profits on deposits), i.e. according to the formula: The deposit minus the amount of all applications, for the payment of profits, is equal to the balance for payment. All payments will be made in 45 days and extend until the end of October.

37. Based on the "formula" that Control-Finance provided in its email to me of September

12, 2017 (Exhibit F), Control-Finance was obligated to return to me my total deposit

(approximately 2.9 Bitcoin) minus the prior payments I received from Control-Finance

(approximately .54 Bitcoin), or 2.36 Bitcoin. Control-Finance never returned the 2.36

Bitcoin to me or made any other payments of Bitcoin or money to me.

38. The September 12, 2017, email also represented, "The [Control-Finance Website] will

temporarily stop working, but all customer databases with their payment and contact

details will be stored on a separate server of the company, this will make all payments to

our customers [sic]." See Exhibit F.

39. As stated above, I never received any transfers of Bitcoin or other payments from

Control-Finance after receiving the September 12, 2017, email (Exhibit F).

40. The September 12, 2017, email also provided, "Since November, our company will

resume its work in a fully legal regime, when all necessary documents will be received

and the frozen accounts of the company will be unblocked." See Exhibit F.


41. The September 12, 2017, email concluded, "As general director of the company, I ask

you to keep your peace of mind and wait for the payment. The first payments were

already made on September 11 and will continue, until the end of October. I want to keep my honest name and the name of our company. I will prove that you can trust me and the company.” See Exhibit F.

42. Based on the representations Control-Finance made to me in the email of September 12, 2017 (Exhibit F), I remained hopeful from September 12, 2017, until approximately October 15, 2017, that I would receive the return of all or part of the Bitcoin I deposited with Control-Finance.
43. As stated above, I never received any transfers of Bitcoin or any other payments from Control-Finance after receiving the September 12, 2017, email (Exhibit F), and I lost the majority of my approximately \$10,000 / 2.9 Bitcoin investment with Control-Finance.

I declare under penalty of perjury that the foregoing is true and correct.



Daniel Stratton

Executed on 6/11/2018 at [Redacted] Spring TX
[Date] [Location] 77308

EXHIBIT A

Grimm, Daniel

From: [REDACTED]@gmail.com>
Sent: Saturday, May 12, 2018 9:06 AM
To: Koh, Ken
Subject: Fwd: Registration Info

#4

----- Forwarded message -----

From: <admin@control-finance.com>
Date: Wed, Aug 9, 2017, 11:41
Subject: Registration Info
To: <[REDACTED]@gmail.com>

Hello Daniel Stratton,

Control Finance would like to congratulate you with registering successfully.

Your login information:

Login: texdevo

You can login here: <https://control-finance.com>

We sincerely appreciate your decision to join our team, and we'll do everything we can to make your work easier and your profit level higher.

Your financial success is important to us, since the success of our company depends on it. Now you have the unique opportunity to make a profit on transactions in the lucrative cryptocurrency market and earn passive income from our affiliate program.

Thank you.

EXHIBIT B



BRAND IDENTITY GUIDELINES

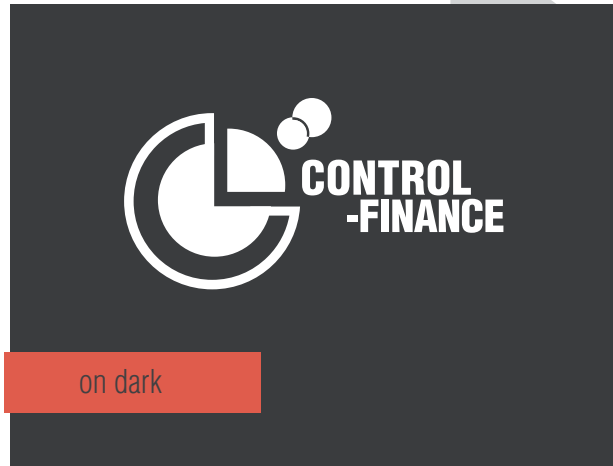
LOGO

The logo is the brand's symbol. The logo symbol and the wordmark together make up the main identifier of the brand.

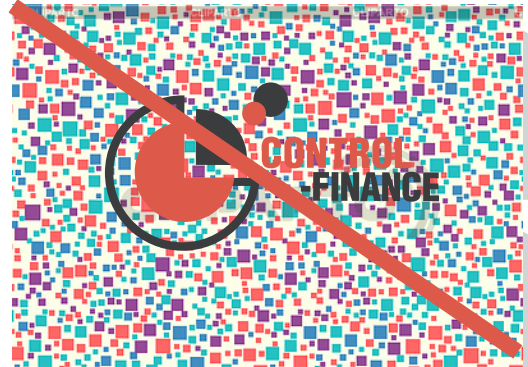
Logo (master version)



Do not distort the logo or change the proportions of the parts. Always use the official digital version.



DO NOT place the logo on backgrounds where it is poorly visible.
Do not use parts of the logo separately. Do not change the position of the elements, the symbol and the text.



Always use the master logo on a white background.

CLEAR SPACE AREA

The clear space surrounding the logo is important for keeping the logo readable and recognizable.



The minimum clear space around the logo is at least half of the height of the wordmark (X).

BRAND PATTERN

The pattern is a set of graphic elements with a specific placement relative to each other. We recommend using the pattern on all branded media. We recommend using the pattern in a logo block, as shown below. For the background, use either a colored bar or the branded background.



Example of a branded block.

Branded background.

COLORS

The primary brand colors are one of the most important parts of the brand identity. Our brand colors can be reproduced using four color models: PANTONE, CMYK, RGB, and HTML. The specific color combination is what creates the brand's color identity.



RGB 219.80.65
CMYK 8.79.73.1
PANTONE 7417
WEB DB5041



RGB 60.60.60
CMYK 0.0.0.90
PANTONE BLACK 7
WEB 3C3C3C

Fonts

The corporate fonts are one of the most important ways that the brand is recognized visually, and they are used on all media. Use AgLettericaCondensed for the main text and AgLettericaCondensedBold **for headings, names, or emphasis inside text.**

ABCDEFGHIJKLMNOPQRSTUVWXYZ
abcdefghijklmnopqrstuvwxyz
012345678 / N^o @ : ; () # * ? ! , .

ABCDEFGHIJKLMNOPQRSTUVWXYZ
abcdefghijklmnopqrstuvwxyz
012345678 / N^o @ : ; () # * ? ! , .

BUSINESS CARDS

Business cards use the brand pattern and contact information. The back of the corporate business card may show directions to the office.



Front side on white paper. Name: AGLettericaCondensedBold 12 pt . Position: AGLettericaLightCondensedBold 9 pt.
Address: AGLettericaLightCondensed 8 pt. Paper: matte white, coated, thickness of at least 300 gsm.

ENVELOPES

Envelopes are designed using the main elements of the brand identity. Follow the rules for using the brand block. Only use the brand colors and fonts.



Only use the brand colors and fonts.



The height of the logo should be equal to the width of the pen or pencil. The pen should be white.

FOLDERS

The folder is designed using the main elements of the brand identity. Follow the rules for using the brand block.

The folder size is 220x310 mm to fit A4 paper size.



LETTERHEAD

Corporate letterhead is designed using the main elements of the brand identity.

Follow the rules for using the logo and brand style.

Only use the brand colors and fonts.

Coated matte paper,
weight of at least 120 gms.
Size 210x297 mm.



FLAGS

The flag is designed using the main elements of the brand identity. Follow the rules for using the brand block.

Select the colors of materials as close to the brand colors as possible.



BADGES

The badge is designed using the main elements of the brand identity.

Follow the rules for using the brand block.

Select the colors of materials as close to the brand colors as possible.



BRAND CLOTHING

T-shirts and caps are designed using the main elements of the brand identity. Follow the rules for using the brand block. Select the colors of materials as close to the brand colors as possible.



PROMO STANDS

Stands are designed using the main elements of the brand identity. Follow the rules for using the brand block.

Any appropriate photos and texts may be used.



EXHIBIT C

Grimm, Daniel

From: [REDACTED]@gmail.com>
Sent: Saturday, May 12, 2018 9:06 AM
To: Koh, Ken
Subject: Fwd: New trade report

#3

----- Forwarded message -----

From: <admin@control-finance.com>
Date: Sat, Aug 19, 2017, 07:12
Subject: New trade report
To: <[REDACTED]@gmail.com>

Hello Daniel Stratton

We posted Company's weekly trade report covering the period from August 07, 2017, to August 13, 2017. You can have a look at it clicking on the following link: https://control-finance.com/report/Trade_report_12.pdf

<https://control-finance.com>

EXHIBIT D

Grimm, Daniel

From: [REDACTED]@gmail.com>
Sent: Saturday, May 12, 2018 9:07 AM
To: Koh, Ken
Subject: Fwd: Withdrawal has been sent

#5

----- Forwarded message -----

From: <admin@control-finance.com>
Date: Tue, Aug 29, 2017, 18:30
Subject: Withdrawal has been sent
To: <[REDACTED]@gmail.com>

Hello Daniel Stratton.

\$202.67 has been successfully sent to your Bitcoin account 16RtpNRv2aEukSoimjW2Uw2RWXBE4d2S67.
Transaction batch is CWBH2DYX5QDVQLOU3INNZPJHTR.

control-finance.com
<https://control-finance.com>

EXHIBIT E

Grimm, Daniel

From: [REDACTED]@gmail.com>
Sent: Saturday, May 12, 2018 9:05 AM
To: Koh, Ken
Subject: Fwd: Official News of Control Finance

#2

----- Forwarded message -----
From: <admin@control-finance.com>
Date: Mon, Sep 11, 2017, 17:55
Subject: Official News of Control Finance
To: [REDACTED]@gmail.com>

Hello Daniel Stratton

As you all know we currently experience an issue with delayed payments, but we're now establishing a new algorithm for automated processing of all payments which will release your delayed payments in a short time. We have a big amount of withdrawal requests, so we can't process them all manually, but the new system will be up and running since on September 11, 12:00 PM (UK Time).

In accordance with our new guidelines for traders, we have diversified the funds on trading accounts, which led to blocking of a few of them. The exchange reps informed us that the accounts were temporarily blocked as a measure against money laundering. Our lawyers are working to activate the accounts and according to the information from the exchange, our accounts will be unblocked not later than September 17.

These challenges putting us on test, but we feel your support and we guarantee that we'll fulfill all obligations given to our customers. I hope for your understanding. We will live through the challenges and continue our stable growth to high profits as we always did in our company.

EXHIBIT F

Grimm, Daniel

From: [REDACTED]@gmail.com>
Sent: Saturday, May 12, 2018 9:05 AM
To: Koh, Ken
Subject: Control-Finance Fwd: News

Ken
Here is last email
Dan

----- Forwarded message -----

From: <admin@control-finance.com>
Date: Tue, Sep 12, 2017, 13:19
Subject: News
To: <[REDACTED]@gmail.com>

Hello Daniel Stratton

We would like to inform you of the urgent news. Our lawyers received information about the conditions for unlocking all trading accounts of the company. One of them is getting the necessary package of documents and license. This will allow us to restore access to our accounts and conduct our trading activities on the cryptocurrency markets completely legally.

Blocking of accounts at the moment and suspension of payments is considered to be a force majeure situation. In this connection, we are forced to fulfill our obligations to clients.

This will be organized in the form of, payment of the customer's deposit (taking into account already previously paid applications for payment of profit on deposits), i.e. according to the formula:

The deposit minus the amount of all applications, for the payment of profits, is equal to the balance for payment. All payments will be made in 45 days and extend until the end of October.

The site will temporarily stop working, but all customer databases with their payment and contact details will be stored on a separate server of the company, this will make all payments to our customers.

Since November, our company will resume its work in a fully legal regime, when all necessary documents will be received and the frozen accounts of the company will be unblocked.

As general director of the company, I ask you to keep your peace of mind and wait for the payment. The first payments were already made on September 11 and will continue, until the end of October. I want to keep my honest name and the name of our company. I will prove that you can trust me and the company.